

# Environmental Health Coalition

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Alan C. Lloyd  
Secretary, California Environmental Protection Agency  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95812-2815  
Attention: Eileen Wenger Tutt

Via Fax: 916-319-7811

Via Email: [etutt@calepa.ca.gov](mailto:etutt@calepa.ca.gov)

RE: Comments of ENVIRONMENTAL HEALTH COALITION on Climate Action  
Team Report to the Governor and Legislature

Dear Dr. Lloyd:

I am writing to submit Environmental Health Coalition's comments on California EPA's Climate Action Team Report to the Governor and Legislature.

EHC is a grassroots environmental justice organization that has been working in the San Diego region for 25 years. The communities in which we work consist of primarily minority and low income populations. One of the greatest threats to community health and environmental security in these communities is the South Bay Power Plant located on the bayfront of the City of Chula Vista.

The South Bay Power Plant is a 40-year-old generation facility with an antiquated cooling system that takes in and chlorinates up to 600 million gallons of water from the South Bay per day and then de-chlorinates and discharges the same water at very high temperatures. While the heating of gross amounts of Bay water, and related environmental impacts to the sensitive marine habitat, has not yet been officially identified as a contributor to global warming and climate change, air emissions from the South Bay Power Plant are clearly a factor. This plant alone emits 600,000 tons of CO<sub>2</sub> per year, which is equivalent to the CO<sub>2</sub> emissions from 90,000 average US cars per year, according to information available on the federal EPA website.<sup>1</sup> The plant also emits

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<sup>1</sup> [http://www.epa.gov/airmarkets/emissions/prelimarp/05q2/052\\_ca.txt](http://www.epa.gov/airmarkets/emissions/prelimarp/05q2/052_ca.txt) and EPA's Personal Greenhouse Gas Calculator at [yosemite.epa.gov/oar/globalwarming.nsf/content/ResourceCenterToolsGHGCalculator.html](http://yosemite.epa.gov/oar/globalwarming.nsf/content/ResourceCenterToolsGHGCalculator.html)

for these communities should be in place to ensure that disproportionate impacts will not occur due to the lack of a level playing field.

4. Consultations with minority and low income communities were limited to only two cities, Los Angeles and Richmond. We strongly recommend broader and more diverse consultations throughout the state, including heavily impacted communities in the South Bay, as well as in Inland Valleys and Imperial County. We invite representatives of the Climate Action Team, now and in the future, to conduct outreach with communities where EHC works in the San Diego region. Instead of limiting mention of minority and low income communities as vulnerable populations at the end of the report, further consultations would reveal that these communities are key stakeholders that could also play a role in influencing and contributing to emissions reductions. This aspect deserves mention within the four recommendations at the front of the report.

Hurricane Katrina taught us that natural disasters are man-made and existing discriminatory conditions negatively impact minority and low income communities. Thus, these communities need to be at the forefront of both prevention and reconstruction, and EHC's recommendations on the Climate Action Team Report are directly related to that goal. We appreciate the opportunity to comment and look forward to future interactions on this issue.

Sincerely,

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